

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DISTRICT

Granted.
It is SO ORDERED.
s/Dan Aaron Polster
United States District Judge
3/21/2024

CARLOS KALMAR,)	CASE NO. 1:24-CV-00193
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MOTION TO FILE REDACTED
)	PORTIONS OF MOTION TO DISMISS
CLEVELAND INSTITUTE OF MUSIC,)	UNDER SEAL
<i>et al.</i> ,)	
)	
Defendants.)	

Now comes Defendant Vivian Scott by and through undersigned counsel, and hereby moves this Court for leave to file the redacted portions her Motion to Dismiss to the Plaintiffs' Amended Complaint under seal, a redacted version of the Motion is being filed concurrently herein.

Specifically, the Motion to Dismiss contains several quotations to the investigative report which was filed with this Court on March 12, 2024 ("Investigative Report") under seal pursuant to this Court's Order. Doc. No. 17. For the reasons set forth in CIM Defendants' Motion for Order to File an Exhibit to Partial Motion to Dismiss, which is incorporated herein, Scott respectfully requests that this Court grant permission for Scott to file the redacted portions of her Motion to Dismiss under seal.

Respectfully submitted,

/s/ Kathleen A. Nitschke

Kerin Lyn Kaminski (0013522)

Kathleen A. Nitschke (0073397)

PEREZ & MORRIS, LLC

1300 East Ninth Street, Suite 1600

Cleveland, Ohio 44114

Telephone: 216-621-5161

Facsimile: 216-621-2399

Email: kkaminski@perez-morris.com

knitschke@perez-morris.com

Counsel for Defendant Vivian Scott